2011-329.C 232093 232095



Via Overnight Delivery

September 7, 2011

Ms. Jocelyn Boyd, Chief Clerk & Administrator South Carolina Public Service Commission 101 Executive Center Drive Suite 100 Columbia, SC 29210

Re: ACN Communication Services, Inc. Petition for Waiver of Bond Requirement Under Regulation 103-607

Dear Ms. Boyd:

Please accept this letter, submitted on behalf of ACN Communication Services, Inc. ("ACN" or the "Company"), as a request for waiver of the requirement under Regulation 103-607 to post a bond or other security mechanism. Pursuant to that regulation, the Commission may waive the bond requirement if the telephone utility provides evidence of financial stability as deemed appropriate by the Commission. In support of its request, ACN states as follows:

ACN is a well-established telecommunications carrier that operates throughout the United States. The Company is authorized to operate as a CLEC and long distance reseller in all 50 states and the District of Columbia. It has provided long distance services throughout the United States for approximately 11 years and local exchange and bundled services for approximately 8 years in most states. ACN was granted authority to provide facilities-based and resold local exchange services in South Carolina by order dated February 17, 2003 in Docket No. 2003-319-C, and has held authority as a long distance reseller in the state since 2000. ACN provides service predominantly to residential customers.

The Company provides local services by leasing the facilities of underlying carriers and long distance services via resale of other carrier services. Consequently, it does not own telecommunications facilities in South Carolina. Nevertheless, ACN believes that evidence of its financial stability justifies a waiver of the new bond requirement imposed on local exchange carriers. Specifically, the Company's financial statements, which were submitted under seal with its 2010 Annual Report filed with the Commission, demonstrate the Company's financial strength and stability.

ACN's stable financial condition and its longevity as a telecommunications provider in South Carolina and throughout the country justify a waiver of the bond requirement imposed under Regulation 103-607. Accordingly, the Company respectfully requests that the Commission issue an order granting such a waiver as expeditiously as possible.

Please acknowledge receipt of this filing by date stamping the extra copy of this letter and returning it to me in the self-addressed, stamped envelope that is provided for this purpose.

Ms. Jocelyn Boyd, Chief Clerk & Administrator Page 2

Please direct any inquiries regarding this request to Sharon Thomas at 407-740-3031 or sthomas@tminc.com.

Sincerely,

Sharon Thomas

Consultant to ACN Communication Services, Inc.

Cc: Mr. C. Dukes Scott, Executive Director, ORS

S. Williams, ACN

File: ACN – SC Local

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